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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 JILL LAMONTE, an individual,

12 Plaintiff,

13 v.

14 AINSWORTH GAME TECHNOLOGY, INC., a
Florida corporation; MARGHERITA
15 AVENTAS, an individual; and DOES 1–20,
inclusive,
16

17 Defendants.
18
19
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Case No. 2:14-cv-00538-RFB-PAL

**JOINT STIPULATION FOR
EXTENSION TO DISCOVERY
COMPLETION DEADLINE**

(First Request)

21 Pursuant to the Court's Scheduling Order of June 26, 2014, Rule 6(b)(1) of the
22 Federal Rules of Civil Procedure, and Local Rules 6-1 and 26-1, Plaintiff JILL LAMONTE and
23 DEFENDANTS AINSWORTH GAME TECHNOLOGY, INC. and MARGHERITA AVENTAS
24 hereby submit this Joint Stipulation for Extension to Discovery Completion Deadline. Neither party
25 has previously requested an extension to the discovery completion deadline.

26 **I. Statement of Discovery Completed**

27 Plaintiff and Defendants have begun initial written discovery efforts and depositions.
28 Both sides have submitted first sets of written discovery requests and have responded in kind.

1 Defendant AINSWORTH served a second set of written discovery requests on September 2, 2014.
2 Defendants took Plaintiff's deposition on August 7, 2014. Plaintiff began taking depositions of
3 Defendant AINSWORTH's employees on September 11, 2014.

4 **II. Description of Remaining Discovery**

5 Plaintiff JILL LAMONTE and Defendant AINSWORTH GAME TECHNOLOGY,
6 INC. ("AINSWORTH") have met and conferred at length regarding Defendant's discovery
7 responses and unfortunately reached an impasse earlier this week. Plaintiff is currently preparing
8 and will soon file a Motion to Compel Further Responses. Plaintiff anticipates that the further
9 responses and documents to be produced by Defendant AINSWORTH will be instrumental in the
10 further depositions of Defendant AINSWORTH's employees and may trigger the need for additional
11 written discovery requests from Plaintiff.

12 Plaintiff has begun taking depositions of Defendant AINSWORTH'S employees, but
13 will not have sufficient time under the current deadline to complete the employee depositions.

14 Additionally, Plaintiff asserts that during her deposition facts supporting a claim of
15 Defamation were first brought to light. Counsel for Plaintiff stated on the record during the
16 deposition that Plaintiff would be seeking leave to file an amended pleading to include Defamation,
17 as it is not a cause of action under the initial Complaint nor Plaintiff's Proposed First Amended
18 Complaint (Motion to Amend filed May 9, 2014 and still pending). Both parties will need to
19 conduct discovery into this cause of action once a Second Amended Complaint has been filed.

20 Finally, Plaintiff will be responding to Defendant AINSWORTH's second sets of
21 interrogatories and requests for production, which responses are due on October 6, 2014.

22 **III. Reasons Why Discovery Not Completed/Statement of Good Cause**

23 As explained above, Plaintiff will seek further responses and documents from
24 Defendant AINSWORTH which she believes will be important to the depositions of
25 AINSWORTH's employees and may trigger the need for additional written discovery requests.

26 In addition, Plaintiff has not yet completed its depositions of Defendant
27 AINSWORTH's employees.
28

Finally, good cause exists because the parties are attempting in good faith to informally resolve the case.

IV. Proposed Schedule for Discovery Completion

In accordance with the Court's Scheduling Order of June 26, 2014, the current deadline for the parties to complete discovery is October 6, 2014. The parties request that the deadline be extended by at least two months. The parties respectfully propose December 15, 2014 as the new deadline.

V. Stipulation

By and through their counsel of record, the parties hereby stipulate as follows:

WHEREAS the parties will not be able to complete all discovery efforts prior to the current discovery completion deadline of October 6, 2014;

THE PARTIES HEREBY STIPULATE that the discovery completion deadline be extended to December 15, 2014.

IT IS SO STIPULATED.

September 15, 2014
Dated:

/S/ IAN G. ROBERTSON
Ian G. Robertson
Fine, Boggs & Perkins LLP

Attorneys for Plaintiff
JILL LAMONTE

September 15, 2014
Dated:

/S/ SUSAN H. HILDEN
Susan H. Hilden
Littler Mendelson

Attorneys for Defendants

IT IS SO ORDERED.

Dated:

JUDGE OF THE U.S. DISTRICT COURT
NEVADA